

## REMARKS

Applicants respectfully request declaration of an interference in accordance with 37 C.F.R. § 1.607 as follows.

**Compliance with 37 C.F.R. § 1.607(a)****(a) Identification of the Patent**

Applicants request that an interference be declared between the above-identified patent application and U.S. Patent No. 5,709,568 (hereinafter "the Pan patent"), issued January 20, 1998, a copy of which is enclosed herewith. Newly added claims 29-32 of the present application are directed to substantially the same invention as at least claims 1 and 3-5 of the Pan patent.

Applicants have fully complied with the requirements of 35 U.S.C. § 135(b) by presenting claims covering substantially the same invention as that claimed in the Pan patent prior to one year from the date the Pan patent was granted. Specifically, in a reply dated January 20, 1999, in parent patent application number 09/013,495, Applicants added new claims 30-33, which mirror claims 1 and 3-5, respectively, of the Pan patent (and claims 29-32, respectively, set forth above). In that reply, Applicants noted that the claims were being added to preserve any rights available under 35 U.S.C. 135. The amendment was thus filed prior to one year from the date that the Pan patent was granted, January 20, 1998. See M.P.E.P. § 2307 and *Switzer v. Sockman*, 333 F.2d 935, 142 U.S.P.Q. 226 (C.C.P.A. 1964), holding that the one year anniversary date of the issuance of a patent is prior to one year from the date on which the patent was granted.

**(b) Presentation of a Proposed Count**

Applicants present in Appendix A, attached hereto, the proposed Count. In compliance with 37 C.F.R. § 1.606, the proposed Count is broader than any claim in the Pan patent and any claim in the present patent application.

**(c) Identification of Claims Corresponding to the Count**

Applicants identify claims 1-8 of the Pan patent and claims 29-32 of the present patent application as corresponding to the Count and as being directed to substantially the same patentable invention, in accordance with 37 CFR §1.601(n) and as specified by *Winter v. Fujita*, 53 U.S.P.Q.2d 1234, 1243 (Bd. Pat. App. & Int. 1999).

Applicants' claim 29 is identical to Pan claim 1, Applicants' claim 30 is identical to Pan claim 3, Applicants' claim 31 is identical to Pan claim 4, and Applicants' claim 32 is identical to Pan claim 5 except with respect to its preamble.

**(d) Application of the Terms of Applicants' Disclosure to the Copied Claims**

The PTO has already acknowledged that copied claims 29-32 are supported by the Applicants' specification. In an office action dated September 23, 1999 during prosecution of the parent patent application, the Examiner entered newly added claims 30-33, which are virtually the same as the copied claims. Further, the Examiner noted that the claimed subject matter is fully disclosed in the patent that issued from the parent case. (Office Action dated February 19, 1999, at page 2). Although the Examiner has already acknowledged support of the copied claims, Applicants illustrate representative support in their disclosure for the limitations of the copied claims in attached Appendix B. Additional support for the claims has been omitted from the Appendix for the sake of brevity.

**(e) Applicants' Effective Filing Date**

The present application is a continuation of U.S. patent application Serial No. 09/013,495, filed January 26, 1998, which is a continuation of U.S. patent application Serial No. 08/775,532, filed January 2, 1997, which was a continuation of U.S. patent application Serial No. 08/369,614, filed January 6, 1995, now abandoned.

Not only does the specification of the present patent application contain all of the

disclosure of application Serial No. 08/369,614, but all of the text relied upon for support of the pending claims appears in that patent application. Accordingly, pursuant to 35 U.S.C. § 120, Applicants' effective filing date is January 6, 1995, the filing date of application Serial No. 08/369,614.

**(f) Pan's Effective Filing Date**

The Pan patent issued from application Serial No. 08/503,706, filed on July 18, 1995. The Pan patent does not claim priority from any earlier application. Accordingly, Pan's effective filing date is July 18, 1995.

**Compliance With 37 CFR §1.608**

Since Applicants have the earlier filing date, there is no requirement that they establish a *prima facie* case of earlier priority under 37 C.F.R. § 1.608.

**Preparation of PTO 850**

To assist the Examiner in preparing PTO 850 as required by M.P.E.P. § 2309.02, the following entries are suggested:

- (1) The Count for the interference should be the Count set forth herein in Appendix A.
- (2) All claims of the Pan patent should be designated as corresponding to the Count. Applicants' claims 29-32, all pending claims of the above-identified patent application, should be designated as corresponding to the Count.
- (3) No claim of either party should be designated as not corresponding to the Count since no claim of either party is directed to an invention that would be patentable in view of the Count.
- (4) Priority benefit should be as follows:  
Applicants: Application Serial No. 09/013,495, filed on January 26, 1998;

application Serial No. 08/775,532, filed on January 2, 1997;

application Serial No. 08/369,614, filed on January 6, 1995. ✓

Pan: Application Serial No. 08/503,706, filed on July 18, 1995. ✓

### **The Requested Interference Should Be Declared**

Although all of Applicants' claims are believed patentable, the Examiner need only find a single allowable claim in this application that is directed to the same invention for an interference to be declared. *See*, M.P.E.P. § 2306, first paragraph.

Applicants respectfully request that this request for interference be promptly evaluated (as required by 37 C.F.R. § 1.607) and that the proposed interference promptly be declared. *See*, M.P.E.P. § 708.01.

Applicants wish to point out that they present claims directed to substantially the same invention as claimed in the Pan patent. Thus, the subject matter of the claims has been examined and deemed allowable by the examiner who allowed the Pan patent. Moreover, the subject matter of the claims has been examined in the parent case and claims 30-32 (which mirror claims 29-31 in the present application) have been deemed allowable.

Should the present examination involve rejections of Applicants' claims that would have been equally applicable against the claims of the Pan patent, Applicants respectfully note M.P.E.P. § 2307.02, which requires the approval of the Group Director for such a rejection. Applicants are presumptively the prior inventors of the claimed subject matter, and desire an interference to prove that they are the actual prior inventors. Their opportunity to do so should not be unduly delayed.

Please contact Applicants' attorney, Raymond N. Scott Jr., at (215) 564-8951 if he can be of assistance in expediting this request.

Attached hereto is a marked-up version of the changes made to the specification and claims by the current amendment. The attached page is captioned "Version with markings to show changes made."

Respectfully submitted,



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APPENDIX A

Count:

A memory card connector assembly mounted on a mother board, comprising:

a memory card connector apparatus comprising stacked memory card connectors, each having a plurality of contact tails extending backward on its rear side; and

a connection device vertically positioned on the rear side of the memory card connector apparatus and comprising a daughter board and a card edge connector, said daughter board electrically connected with some of the contact tails of the memory card connector apparatus and further having circuit pads on a bottom edge region thereof, wherein said card edge connector has a plurality of contacts mechanically and electrically mounted on the mother board and further has a slot facing upward for receiving said bottom edge region of the daughter board, so that some signals may be transmitted between the mother board and the memory card connector apparatus via said connection device

OR

a system comprising:

a daughter board vertically positioned on a rear side of the electrical connector apparatus wherein contact tails of the connector apparatus generally extend backward horizontally and parallel with each other and are electrically connected to first conductive means on the daughter board, respectively, and wherein said daughter board further includes second conductive means adjacent a bottom edge;

a receiving connector mounted onto the mother board wherein said receiving connector comprises a plurality of contacts;

the electrical connector apparatus with pre-assembled daughter board being mounted onto the mother board under the condition that the second conductive means of the daughter board mechanically and electrically engage the contacts of the receiving connector so that each of contacts of the receiving connector electrically interconnects a corresponding pad on the mother board and a corresponding one of second conductive means of the daughter board for transmission of signals from the electrical connector apparatus through the daughter board and the receiving connector to the mother board;

wherein said first conductive means are spaced holes in the daughter board and the second conductive means are circuit pads on a bottom edge region of the daughter board, and said receiving connector is a card edge connector having a slot facing upward for receiving the bottom edge of the daughter board, and the contacts of the receiving connector project into the slot for engagement with the corresponding circuit pads on the daughter board, respectively.

## Appendix B

CLAIM	EXEMPLARY SUPPORT IN SPECIFICATION
<p>29. A memory card connector assembly mounted on a mother board, comprising:  a memory card connector apparatus comprising stacked memory card connectors,</p>	<p>discloses two memory card connectors 1 and 1' stacked together and installed on a mainboard 2 (page 4, lines 3-4 and Fig. 3)</p>
<p>each having a plurality of contact tails extending backward on its rear side; and</p>	<p>discloses a header 10 that is provided with a plurality of pins 101 extending in both inward and outward directions wherein outward pins 103 extend from an outward edge 104 of header 10 (page 3, lines 11-13, 15-17 and Figs. 1, 2, 3)</p>
<p>a connection device vertically positioned on the rear side of the memory card connector apparatus and comprising a daughter board and a card edge connector, said daughter board electrically connected with some of the contact tails of the memory card connector apparatus and further having circuit pads on a bottom edge region thereof,</p>	<p>discloses a lower end of a vertical circuit board 14 that is detachably inserted into a female connector 3 to effect electrical connection (page 3, lines 18-20 and Figs. 1, 2, 3) and discloses vertical circuit board 14 as being electrically and securely connected to outward pins 103 that extend from an outward edge 104 of the header 10, and as having circuit pads on its bottom region (page 3, lines 15-17 and Figs. 1, 2, 3)</p>
<p>wherein said card edge connector has a plurality of contacts mechanically and electrically mounted on the mother board</p>	<p>discloses a female connector 3 that is securely mounted with multiple contacts to a surface of mainboard 2 for mounting memory card connector 1 (page 3, lines 17-18 and Figs. 1, 2, 3)</p>



and further has a slot facing upward for receiving said bottom edge region of the daughter board, so that some signals may be transmitted between the mother board and the memory card connector apparatus via said connection device.	discloses a lower end of a vertical circuit board 14 that is detachably inserted into a slot in female connector 3 to effect electrical connection (page 3, lines 18-20 and Fig. 1)
30. The memory card connector assembly as described in claim 29, wherein said contact tails of the memory card connectors generally extend horizontally and parallel with each other.	discloses a header 10 that is provided with a plurality of pins 101 extending generally horizontally in both inward and outward directions (page 3, lines 11-13 and Figs. 1, 2, 3)
31. The memory card connector assembly as described in claim 30, wherein said daughter board includes a plurality of holes therein corresponding to said contact tails of the memory card connectors for receiving said contact tails therein.	discloses a vertical circuit board 14 having holes for receiving outward pins 103 (Figs. 2 and 3)
32. A system comprising: a daughter board vertically positioned on a rear side of the electrical connector apparatus	discloses a vertical circuit board 14 that is electrically and securely connected to outward pins 103 that extend from an outward edge 104 of header 10 (page 3, lines 15-17 and Figs. 1, 2, 3)
wherein contact tails of the connector apparatus generally extend backward horizontally and parallel with each other and are electrically connected to first conductive means on the daughter board, respectively, and wherein said daughter board further includes second conductive means adjacent a bottom edge;	discloses a vertical circuit board 14 that is electrically and securely connected to outward pins 103 that extend generally horizontally from an outward edge 104 of header 10, and as having circuit pads on its bottom region (page 3, lines 15-17 and Figs. 1, 2, 3)

<p>a receiving connector mounted onto the mother board wherein said receiving connector comprises a plurality of contacts;</p>	<p>discloses a female connector 3 that is securely mounted with multiple contacts to a surface of mainboard 2 for mounting memory card connector 1 (page 3, lines 17-18 and Figs. 1, 2, 3)</p>
<p>the electrical connector apparatus with pre-assembled daughter board being mounted onto the mother board under the condition that the second conductive means of the daughter board mechanically and electrically engage the contacts of the receiving connector so that each of contacts of the receiving connector electrically interconnects a corresponding pad on the mother board and a corresponding one of second conductive means of the daughter board for transmission of signals from the electrical connector apparatus through the daughter board and the receiving connector to the mother board;</p>	<p>discloses a lower end of a vertical circuit board 14 that is detachably inserted into a female connector 3 to effect electrical connection, and as having circuit pads on its bottom region (page 3, lines 18-20 and Fig. 1)</p>
<p>wherein said first conductive means are spaced holes in the daughter board and the second conductive means are circuit pads on a bottom edge region of the daughter board,</p>	<p>discloses a vertical circuit board 14 having holes for receiving outward pins 103, and as having circuit pads on its bottom region (Figs. 2 and 3)</p>
<p>and said receiving connector is a card edge connector having a slot facing upward for receiving the bottom edge of the daughter board, and the contacts of the receiving connector project into the slot for engagement with the corresponding circuit pads on the daughter board, respectively.</p>	<p>discloses a lower end of a vertical circuit board 14 that is detachably inserted into a slot of female connector 3 to effect electrical connection, and as having circuit pads on its bottom region (page 3, lines 18-20 and Fig. 1)</p>

**VERSION WITH MARKINGS TO SHOW CHANGES MADE**

**In The Title:**

The title as been amended as follows:

-- [MEMORY] CARD CONNECTOR --

**In the Specification:**

The following paragraph was added on page 1, after the title and before the Background of the Invention section:

**-- Cross Reference To Related Applications**

The present application is a continuation of U.S. patent application Serial No. 09/013,495, entitled "Card Connector", filed January 26, 1998, which is a continuation of U.S. patent application Serial No. 08/775,532, filed January 2, 1997, entitled "Card Connector" and issued as U.S. Patent No. 5,713,747 on February 3, 1998, which was a continuation of U.S. patent application Serial No. 08/369,614, entitled "Memory Card Connector", filed January 6, 1995, now abandoned. --

**In the Claims:**

Claims 1-28 were cancelled and claims 29-32 were newly added, as indicated below:

29. (Newly added) A memory card connector assembly mounted on a mother board, comprising:

a memory card connector apparatus comprising stacked memory card connectors, each having a plurality of contact tails extending backward on its rear side; and

a connection device vertically positioned on the rear side of the memory card connector apparatus and comprising a daughter board and a card edge connector, said daughter board electrically connected with some of the contact tails of the memory card connector apparatus and further having circuit pads on a bottom edge region thereof, wherein said card edge connector has a plurality of contacts mechanically and electrically mounted on the mother board and further has a slot facing upward for receiving said bottom edge region of the daughter board, so that some signals may be transmitted between the mother board and the memory card connector apparatus via said connection device.

30. (Newly added) The memory card connector assembly as described in claim 29, wherein said contact tails of the memory card connectors generally extend horizontally and parallel with each other.

31. (Newly added) The memory card connector assembly as described in claim 30, wherein said daughter board includes a plurality of holes therein corresponding to said contact tails of the memory card connectors for receiving said contact tails therein.

32. (Newly added) A system comprising:

a daughter board vertically positioned on a rear side of the electrical connector apparatus wherein contact tails of the connector apparatus generally extend backward horizontally and parallel with each other and are electrically connected to first conductive means on the daughter board, respectively, and wherein said daughter board further includes second conductive means adjacent a bottom edge;

a receiving connector mounted onto the mother board wherein said receiving connector comprises a plurality of contacts;

the electrical connector apparatus with pre-assembled daughter board being mounted onto the mother board under the condition that the second conductive means of the daughter board mechanically and electrically engage the contacts of the receiving connector so that each of contacts of the receiving connector electrically interconnects a corresponding pad on the mother board and a corresponding one of second conductive means of the daughter board for transmission of signals from the electrical connector apparatus through the daughter board and the receiving connector to the mother board;

wherein said first conductive means are spaced holes in the daughter board and the second conductive means are circuit pads on a bottom edge region of the daughter board, and said receiving connector is a card edge connector having a slot facing upward for receiving the bottom edge of the daughter board, and the contacts of the receiving connector project into the slot for engagement with the corresponding circuit pads on the daughter board, respectively.